

IN THE UNITED STATES DISTRICT COURT
IN THE MIDDLE DISTRICT OF NORTH CAROLINA
DURHAM DIVISION
CIVIL ACTION NO. 1:24-CV-975-JPB-JLW

JAMES CAMPBELL,

Plaintiff,

v.

CABARRUS COUNTY BOARD OF
COMMISSIONS; AND STEVE
MORRIS, IN HIS OFFICIAL
CAPACITY AS BOARD
CHAIRMAN,

Defendants

1. Pursuant to Fed. R. Civ. P. 26(f) and L.R. 5.4(b)(1), a meeting was held on April 30, 2025, via telephone, and was attended by Emily Rae and Troy D. Shelton, attorneys for Plaintiff; and James D. McAlister, attorney for Defendants.

2. Conference: The parties have discussed the issues of confidentiality raised in this case and the potential need for filing documents under seal. That discussion included the nature of any confidential documents that may be involved in the case, the possibility of using stipulations to avoid the need to file certain documents, and the possibility of agreed-upon redactions of immaterial confidential information in filings to avoid the need for filing documents under seal.

3. Default: The parties certify that few, if any, documents will be filed under seal. The parties agree to use the default procedures of LR 5.4(c). In addition, if the party filing the motion to seal is not the party claiming confidentiality, the filing party must meet and confer with the party claiming confidentiality as soon as practicable, but at least two (2) days before filing the documents, to discuss narrowing the claim of confidentiality. The motion to seal must certify that the required conference has occurred, and the party claiming confidentiality must file supporting materials required by LR 5.4(c)(3) within 14 days of the motion to seal.

This the 16th day of May, 2025.

Respectfully submitted,

/s/ Troy D. Shelton
Email: tshelton@dowlingfirm.com
Dowling PLLC
3801 Lake Boone Trail, Suite 260
Raleigh, North Carolina 27607
Attorney for James Campbell

/s/ Emily Rae*
Email: erae@libertyjusticecenter.org
Liberty Justice Center
7500 Rialto Boulevard, Suite 1-250
Austin, Texas 78735
Attorney for James Campbell

/s/ James D. McAlister
Email: jmcaster@mgclaw.com
McAngus, Goudelock & Courie, PLLC
PO Box 30307
Attorney for Cabarrus County Board of Commissioners;
and Steve Morris, in his official capacity as Board
Chairman